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8 Attorneys for Plaintiffs  
THOMAS WEISEL PARTNERS LLC and  
9 THOMAS WEISEL INTERNATIONAL PRIVATE  
LIMITED  
10

11 UNITED STATES DISTRICT COURT  
12 NORTHERN DISTRICT OF CALIFORNIA  
13 SAN FRANCISCO DIVISION  
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15 THOMAS WEISEL PARTNERS LLC, a  
16 Delaware limited liability company, and  
THOMAS WEISEL INTERNATIONAL  
17 PRIVATE LIMITED, an Indian company,

18 Plaintiffs,

19 v.

20 BNP PARIBAS, a French corporation, BNP  
PARIBAS SECURITIES (ASIA) LIMITED,  
21 a Hong Kong company, and PRAVEEN  
CHAKRAVARTY, an individual,

22 Defendants.  
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No. C-07-6198 MHP

Action Filed: December 6, 2007

DECLARATION OF MICHAEL L.  
GALLO IN SUPPORT OF MOTION  
FOR ADMINISTRATIVE RELIEF (1)  
TO FILE A CONSOLIDATED  
OPPOSITION TO DEFENDANTS BNP  
PARIBAS AND BNP PARIBAS  
SECURITIES (ASIA) LTD'S AND  
DEFENDANT PRAVEEN  
CHAKRAVARTY'S MOTIONS TO  
DISMISS PLAINTIFF'S FIRST  
AMENDED COMPLAINT AND (2) TO  
EXCEED NORMAL PAGE LIMITS FOR  
AN OPPOSITION BRIEF

Place: Courtroom 15  
Judge: Hon Marilyn Hall Patel

1 I, Michael L. Gallo, declare as follows:

2 1. I am an attorney admitted to practice before the Bar of the State of  
3 California. I am an associate with the law firm of Howard Rice Nemerovski Canady Falk &  
4 Rabkin, A Professional Corporation, counsel to Plaintiffs Thomas Weisel Partners LLC  
5 ("TWP LLC") and Thomas Weisel International Private Limited ("TWIPL") in this action. I  
6 make this Declaration upon personal knowledge and, if called upon to testify, could and  
7 would testify competently hereto.

8 2. I make this declaration in support of Plaintiffs' Motion For Administrative  
9 Relief (1) To File A Consolidated Opposition To Defendants BNP Paribas and BNP Paribas  
10 Securities (Asia) Limited's And Defendant Praveen Chakravarty's Motions To Dismiss  
11 Plaintiffs' First Amended Complaint and (2) To Exceed Normal Page Limits For An  
12 Opposition Brief.

13 3. On December 6, 2007, Plaintiffs filed a complaint in this Court. On January  
14 15, 2008, Plaintiffs filed their First Amended Complaint.

15 4. On March 7, 2008, BNP Paribas and BNP Paribas Securities (Asia) Limited  
16 (the "BNP Paribas Defendants") filed their Motion to Dismiss Plaintiffs' First Amended  
17 Complaint.

18 5. On April 24, 2008, Chakravarty filed his Motion to Dismiss Plaintiffs' First  
19 Amended Complaint.

20 6. Both the BNP Paribas Defendants and Chakravarty's motions seek to  
21 dismiss the First Amended Complaint on the alleged grounds of lack of personal jurisdiction  
22 and forum non conveniens. Both motions speak to the same underlying facts, and there is  
23 considerable overlap in the arguments.

24 7. Plaintiffs believe that responding to Defendants' two jurisdictional motions  
25 separately would require Plaintiffs to discuss, and the Court to read, many of the same  
26 background facts and legal principles twice. Plaintiffs believe it would be more efficient for  
27 the parties and the Court for Plaintiffs to file a consolidated opposition to both jurisdictional  
28 motions.

8. If Plaintiffs were filing separate oppositions to Defendants' two jurisdictional motions, they would have 50 pages in which to discuss the relevant facts and law. Because of the economies of discussing shared facts and law only once, Plaintiffs believe they can make their case in no more than 40 pages. Plaintiffs believe, however, that having substantially fewer than 40 pages to oppose Defendants' two motions could prejudice their ability to respond adequately to the arguments Defendants have raised.

9. In several telephone conversations and email exchanges over the last few days, I have discussed with counsel for the BNP Defendants and counsel for Chakravarty both Plaintiffs' concerns and Plaintiffs' proposal to file a consolidated opposition of no more than 40 pages to Defendants' two jurisdictional motions. Defendants have stipulated that they have no objection to Plaintiffs filing a consolidated opposition of no more than 40 pages to their two jurisdictional motions. Defendants have also stipulated that they will not oppose Plaintiffs' Motion for Administrative Relief requesting permission from the Court to file a consolidated opposition of no more than 40 pages. .

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 18th day of June, 2008 at San Francisco, California.

/s/  
Michael L. Gallo